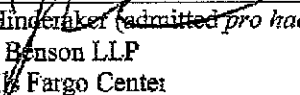


**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

THE WOOSTER BRUSH COMPANY	)	Civil No. 5:06 CV 474
	)	
Plaintiff,	)	JUDGE JOHN R. ADAMS
	)	
vs.	)	
	)	
BERCOM INTERNATIONAL LLC	)	<b><u>JOINT MOTION FOR</u></b>
	)	<b><u>PROTECTIVE ORDER</u></b>
	)	
Defendant.	)	
	)	

Pursuant to Federal Rule of Civil Procedure 26(c), the parties, Plaintiff The Wooster Brush Company (“Wooster Brush”), together with Defendant Bercom International LLC (“Bercom”), through their counsel, move the Court to enter an Agreed Protective Order in the above-captioned case. Counsel for the parties certify that this Motion is made in good faith and that counsel for the parties have conferred and mutually agreed to the terms of the Agreed Protective Order attached hereto. The parties agree that entry of this Agreed Protective Order is necessary to protect the parties against improper dissemination of trade secrets and/or other confidential information. Accordingly, the parties respectfully request that this Court authorize and enter the Agreed Protective Order that the parties have prepared (attached as Exhibit A), or enter an Order in a form substantially similar thereto.

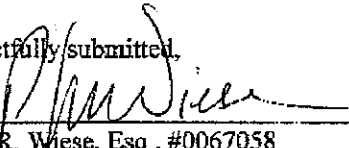
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